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November 14, 1995

William F. Caton  
Federal Communications Commission  
1919 M Street NW  
Washington DC 20554

DOCKET FILE COPY ORIGINAL

Dear Sir:

Enclosed you will find an original and nine copies of the Reply Comments made by Scherers Communications Group, Inc. Copies were also mailed to the original commentors to the Notice of Proposed Rulemaking in the Matter of Toll Free Service Access Codes, CC Docket No. 95-155.

Please feel free to contact me at the telephone listed above if you have any questions.

Sincerely,

Susan Drombetta  
Manager - Rates and Tariffs

enclosure

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
**WASHINGTON, D.C. 20554**

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In the Matter of )

Toll Free Service Access Codes )

) CC Docket No. 95-155  
)  
)

**REPLY COMMENTS OF**  
**SCHERERS COMMUNICATIONS GROUP, INC.**

FEDERAL COMMUNICATIONS  
COMMISSION  
OFFICE OF THE  
SECRETARY

NOV 20 '95

RECEIVED

**Susan Drombetta**  
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**Worthington OH 43085**

**Dated: November 14, 1995**

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**Before the**

**FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

**In the Matter of**

**Toll Free Service Access Codes**

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**CC Docket No. 95-155**

**REPLY COMMENTS OF  
SCHERERS COMMUNICATIONS GROUP, INC.**

Scherers Communications Group, Inc. (SCG), hereby submits its Reply Comments concerning the Notice of Proposed Rulemaking (Notice) on Toll Free Service Access Codes, CC Docket No. 95-155 released on October 5, 1995. The Commission received comments from approximately 130 parties representing Interexchange Carriers, Local Exchange Providers, various industry associations, customers, and other interested parties. (The list of filing parties is attached as Appendix A)

**I. INTRODUCTION**

Due to the wide variety of commentors, responses to the Notice were varied and, in most cases, dependent upon the sector represented. However, the commentors did agree on several points. First of all, most commentors support the Commission's involvement in the implementation of the 888 NPA. Because of the many issues involving allocations, assignment of numbers, network design, and download capacities, it was necessary to establish a means of hearing all aspects of the issues. The other issues upon which most commentors agreed were the necessity of affirmative customer requests prior to number reservations, the drawbacks of utilizing an escrow fund for reservations,

and the failure of SIC codes to prevent competitors from securing replicated numbers. As SCG has already stated its position on these issues in its previous comments, these reply comments will be limited to discussing the arguments presented by other commentors regarding right of first refusal, lag time modifications, partitioning of numbers by service offering, and the revision of Resp Org guidelines to establish a more even playing field for reservations of strategic numbers.

## **II. RIGHT OF FIRST REFUSAL**

The reaction to the “right of first refusal” proposal was split almost entirely based upon the segment represented. Of the fourteen local exchange providers commenting, none supported the proposal, and ten actually opposed it.<sup>1</sup> Interexchange carriers were mixed in their opinion, with less than half of commentors supporting the proposal.<sup>2</sup> The majority of the customers who commented indicated their support of the “right of first refusal” when the 888 NPA becomes available.<sup>3</sup> However, the presence of the stock phrase “widely known and accepted and utilized by consumers” in many of the letters

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<sup>1</sup> See Comments by Allnet at 6, Ameritech at 31, Bell Atlantic at 8, Bellsouth Telecommunications at 15, GTE at 9, NYNEX at 7-8, Pacific Bell and Nevada Bell at 10, Southern New England Telephone Company at 12, Southwestern Bell Telephone Company at 16, and U. S. West Communications at 18.

<sup>2</sup> See Comments by AT&T at 23, LDDS Worldcom at 12, MCI Telecommunications at 15, and Promoline at 6.

<sup>3</sup> See Comments by 1-800 Balloons, 1-800 Beargram, 1-800-Courier, 1 800 Flowers, 800-Discount, 800 USA Loan, AAA, Aeronautical Radio, American Magnetic Media, American Telegram, Applied Anagramics, Avery Dennison, Avis Rent-a-Car, Barnett Bank, Bass Pro Shops, Brinks Home Security, Crestar Bank, Del Webb Corp., Enterprise Rent-a-Car, Fruit Baskets Unlimited, Geico, HTH Inc., Hallmark Cards, Doug Hicks, Hilton Hotels Corp., Home Access Health, Huntington Services, Ingersoll Rand, Invesco, Johns Hopkins University, Kemper, Lifescan, Mueller, Nabisco, National General Insurance Co., New England Serum, Noritsu, Philbricks Sports Super Mart, Peachtree Fabrics, Private Citizen, Repairs Inc., Roadway Information, Rosenbluth, Ryan International Airlines, Selectel, Service Merchandise, South Winsor Sports Arena, Staples, TLDP Communications, Telcorp, Telmark, Terminix, The Money Store, The Weather Channel, Trench Shoring, U. S. Government General Services Administration, Vanity International, Warner Lambert, Weisleder, and ZAC Catalogs.

indicates that some coaching and soliciting have been done to support one particular carrier's position.<sup>4</sup>

We have chosen to display the responses in this manner to illustrate the fact that commentators aware of the industry as a whole are not supportive of the proposal to offer a "right of first refusal." The main concerns revolve around the quick exhaust of toll free numbers, the precedent set and perception of ownership implied, the inefficient use of resources, and the resulting customer confusion.<sup>5</sup> It is evident that these concerns are directed toward maintaining the common good rather than protecting any individual customer interests. Even those commentators who support the "right of first refusal" stated that the ideal assignment process should be based upon "first come first served."<sup>6</sup> An even greater concern is illustrated by the number of toll free subscribers who already believe that they own their current 800 number.<sup>7</sup> This confusion will increase if replication is permitted. Allnet also submits the opinion that allowing replication in the toll free SAC may result in demands for replicated numbers in other NPAs.<sup>8</sup> Setting this precedent will result in wide ranging effects for NPAs, particularly in light of the Commission's recent involvement in portability.<sup>9</sup> Finally, the usefulness of the 888 NPA as a toll free SAC would be jeopardized by replication. Callers will assume that the same

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<sup>4</sup> See Comments by AT&T at 24, 1 800 Budget Getaways, AAA, Avery Dennison, Eleonore Brock, Crestar Bank, HTH Inc., Huntington Service Co., Ingersoll Rand, Johns Hopkins University, Kemper, Lifescan, Mueller, Nabisco, National General Insurance Co., Roadway Information Technology, Ryan International Airlines, and The Money Store.

<sup>5</sup> See Comments by Ameritech at 31, Bell Atlantic at 7-8, BellSouth at 15, GTE at 9, NYNEX at 8, Pacific Bell and Nevada Bell at 10-14, Southern New England Telephone Company at 12, Southwestern Bell Telephone at 16-18, and U. S. West Communications at 18-24.

<sup>6</sup> See Comments by AT&T at 13, LDDS Worldcom at 7, and MCI at 11.

<sup>7</sup> See Comments by 1-800 Balloons, 1 800 Flowers, 800-Tickets, Applied Anagramics, J. Murray Green, Doug Hicks, Home Access Health, New England Serum Co., Mark D. Olson, Repairs Inc., Staples Direct, Telcorp, Vanity International, and Alan Wershman.

<sup>8</sup> See Comments by Allnet at 10.

<sup>9</sup> See Telephone Number Portability, Notice of Proposed Rulemaking, CC Docket No. 95-116 (released October 10, 1995).

toll free subscriber will be reached regardless of the NPA used. This misconception can be prevented by disallowing the "right of first refusal."

Several suggestions were made in an effort to limit the replication of vanity numbers, including imposition of a fee for replication and limitations based upon call volumes on individual numbers or the embedded customer base of the Resp Org.<sup>10</sup> SCG believes that all of these suggestions will limit the ability of many Resp Orgs to do business if not forcing toll free subscribers to move their business to competitors. Smaller Resp Orgs do not possess the financial capital to invest in either one time or recurring fees for replication. Therefore, they will be forced to turn to the toll free subscriber to pay for these fees. This will place smaller Resp Orgs at a competitive disadvantage when trying to compete with wealthier, more established Resp Orgs. In addition, the larger Resp Orgs have developed a larger customer base which can be used to spread costs or utilize for a higher allocation. We also believe that it is unfair to treat lower volume customers any differently than those with higher volumes. If a Resp Org is encouraged to deal with only high volume customers, they will no longer allow subscribers to try risky, more innovative applications. The toll free industry as a whole will suffer. SCG also is concerned about establishing a 15% allocation for replication based upon the embedded customer base as AT&T has suggested.<sup>11</sup> AT&T has not stated which customers we should refuse to replicate when our allocation has been exhausted. Once again, newer or smaller toll free subscribers would be penalized. The only way to protect competition in the marketplace is to treat all toll free subscribers in the same way.

SCG is aware, however, that customer interests are important. To this end, we reemphasize the benefits of a temporary set aside of numbers. Other commentors concur with this proposal, stressing the fact that customer concerns can be alleviated without the inefficient depletion of a valuable resource.<sup>12</sup> Their suggestions mirror SCG's proposal

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<sup>10</sup> See Comments by AT&T at 24, LDDS Worldcom at 13, and Promoline at 8.

<sup>11</sup> See Comments by AT&T at 27.

<sup>12</sup> See Comments by BellSouth at 15, NYNEX at 8, and U. S. West Communications at 23.

that vanity numbers be placed into a temporary pool until the public is educated. It is only through this option that customer needs will be weighed against the needs of all other current and future customers.

## II. LAG TIMES

Several commentors stated that lag times for all statuses should be reduced to improve the pool of numbers available for assignment.<sup>13</sup> However, the benefits resulting from such a move would be minimal in light of the drawbacks illustrated by other commentors. These drawbacks range include technical provisioning problems,<sup>14</sup> need for customer preparation,<sup>15</sup> and misdirected calls.<sup>16</sup> According to Bell Atlantic, "The periods in the Guidelines were established by the industry as a whole after careful consideration and debate, Bell Atlantic believes that they properly take into account factors such as the financial impact on users of newly disconnected numbers and the staleness of advertising materials."<sup>17</sup> The lead times were discussed by the SMS/800 Number Administration Committee during the development of conservation measures. Although the reduction of lag times is beneficial during periods of conservation, the SNAC found that very valid reasons exist for the times established in the guidelines, contrary to the opinion stated by Promoline Inc.<sup>18</sup> Reserved and assigned periods have been established to accommodate customer preparation and installation intervals. Suspend intervals have been developed to provide for seasonal operations. AirTouch Paging provided a specific example of the

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<sup>13</sup> See Comments by AT&T at 9, Americas Carrier Telecommunications Association at 11, Cable and Wireless Inc. at 2, Nextlink Inc. at 3, Paging Network Inc. at 6, Promoline Inc. at 3, Telco Planning Inc. at 2, Telecompute Corp. at 2, and Time Warner Inc. at 3.

<sup>14</sup> See Comments by MCI at 4 and Sprint at 5.

<sup>15</sup> See Comments by Direct Marketing Association at 2.

<sup>16</sup> See Comments by NIMA International at 4 and Telecommunications Resellers Association at 7

<sup>17</sup> See Comments by Bell Atlantic at 3-4.

<sup>18</sup> See Comments by Promoline at 3.



reasoning for the current time frames for disconnect status listed in the guidelines.<sup>19</sup>

During conservation, the disconnect interval has been reduced, with prompt reassignment causing increased dialing errors and billing problems. In this case, the customer needs are the driving force. The problems encountered with lag times can only be addressed by those who have experienced the results of the decisions made. SCG respectfully suggests that the Commission defer to the decisions made by the industry based upon the members' experience in this matter.

### **III. PARTITIONING**

Several commentors suggested that partitioning would be the ideal solution to the exhaust situation. Their reasoning for this change is based upon the unprecedented growth in certain toll-free applications, such as paging and personal 800.<sup>20</sup> While this information is correct, the problems associated with the immediate implementation of such a plan are obvious. Customer confusion will be increased because it will be necessary to change large volumes of numbers in order to accommodate such a plan. In addition, billing problems will be increased due to dialing errors. In addition, customers will be unsure of what they will be billed for placing the call, since the numbers will be different from other toll free NPAs. These drawbacks are well documented by many commentors.<sup>21</sup> These commentors have experienced the same types of problems in similar situations. Therefore, SCG asks the Commission once again to defer to the industry members' opinions. Based upon all the comments rendered, SCG continues to support its position against partitioning.

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<sup>19</sup> See Comments by AirTouch Paging at 16.

<sup>20</sup> See Comments by 800 Users Coalition at 10, Aeronautical Radio, Inc. at 2, Communications Managers Association at 1, Telco Planning at 4, and Vanity International at 4

<sup>21</sup> See Comments by AirTouch Paging at 13, Bell Atlantic at 9, Telecommunications Resellers Association at 20, and Unitel Communications Inc. at 4

#### **IV. RESERVATION OF STRATEGIC NUMBERS**

In its comments, MCI states that “MCI believes there is no reason for the FCC to take any action on the use of multiple or mechanized interfaces by RespOrgs.”<sup>22</sup> Contrary to this belief, history provides the example used in SCG’s initial comments.<sup>23</sup> Other commentors have expressed the same wish that the Commission intercede on the behalf of smaller Resp Orgs to offer new codes to all Resp Orgs on an equal footing.<sup>24</sup> We do not ask the mechanized users to give up their technology when transmitting high volumes of records. We only ask that mechanized reservations be kept at the same level of processing that manual reservations would use. Equitable reservations of numbers cannot be realized if one entity has the capacity to reserve 1000 numbers per minute while others are limited technologically to 10. Limitations on reservations in a specific time frame will not impede any company’s ability to conduct business. It will simply extend the amount of time necessary to complete the transaction. However, if smaller Resp Orgs are unable to have equal access to strategic numbers, they will lose business. Mechanized generic interfaces were developed when larger interexchange and local carriers were the main clients of the data base. The client base has now changed, and all clients have the right to equal access regardless of technological and economic status. SCG asks the Commission to review the situation and assist these new players to achieve equal status in the playing field.

#### **V. SUMMARY**

It is gratifying to SCG that many issues raised in the Commission’s Notice have been answered with the consensus of the commentors. However, we do ask the Commission to cautiously and painstakingly review the comments and their sources to establish a position on each of the following issues: lag times, partitioning, and

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<sup>22</sup> See Comments by MCI at 11

<sup>23</sup> See Comments by Scherers Communications Group at 10.

<sup>24</sup> See Comments by Cable & Wireless at 9 and Southern New England Telephone Company at 10

reservations of strategic telephone numbers. However, we ask the Commission to take the greatest care in reviewing the issue of replication. While the majority of toll free subscribers expressed approval for replication, it is important to note that these customers are most concerned with their own business livelihood. Those commentators who have the interests of all customers in mind, local exchange providers and interexchange carriers, are mostly in agreement that replication should be avoided.

Respectfully submitted,  
Scherers Communications Group, Inc.

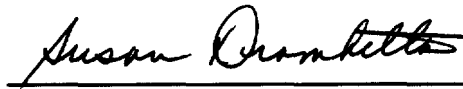
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Manager - Rates and Tariffs

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Dated: November 14, 1995

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of November, 1995, copies of Reply Comments of Scherers Communications Group, Inc., were served by first class mail, postage prepaid, on the following shown as Appendix A.

A handwritten signature in cursive script, reading "Susan Drombetta", is positioned above a horizontal line.

Susan Drombetta

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